

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	: Chapter 11 case pending in the
	: Bankruptcy Court for the
NOMURA SUZUKI PROPERTIES, LTD.,	: Southern District of New York
	:
Debtor.	: Case No. ____ B ____ (SMB)
	:
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	:
KUMIKO HASEGAWA	: Adv. P. No. 98- A
	:
Plaintiff,	:
	:
vs.	:
	:
HIROYOSHI HASEGAWA, SAM SUZUKI,	:
SATOKO SUZUKI, TOMONARI NOMURA	:
and NOMURA SUZUKI PROPERTIES, LTD.,	:
	:
Defendants.	:
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**NOTICE OF REMOVAL OF STATE COURT
ACTION TO BANKRUPTCY COURT**

**TO THE JUDGES OF THE UNITED STATES BANKRUPTCY COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK:**

Nomura Suzuki Properties, Ltd. (the debtor and debtor in possession) in a chapter 11 case pending before the Bankruptcy Court for the Southern District of New York, case no. ____ B ____ (SMB), (the "Debtor"), by its proposed bankruptcy counsel, Salomon Green & Ostrow, P.C., respectfully files this notice of removal, and in support of said notice, respectfully sets forth and represents:

1. On or about September 14, 1998, an action was commenced against the Debtor, Sam Suzuki, Satoko Suzuki, and Tomonari Nomura (the “Related Parties”), in the Supreme Court of the State of New York, County of Westchester, Index No. 12615/96 (the "Removed Action"), by the service of an Amended Summons and Amended Complaint in a pending action naming the Related Parties as defendants.

2. The amended summons and complaint filed in the Removed Action is annexed hereto as Exhibit A. Upon information and belief, no answers to the Second, Third and Fourth Causes of Action asserted therein were filed by Debtor or the Related Parties.

3. The Second, Third and Fourth Causes of Action asserted in the Removed Action involve causes of action that are related to the Debtor's bankruptcy case, under section 1334(b) of title 28 of the United States Code, and is removable pursuant to section 1452(a) of title 28 of the United States Code.

4. The Second, Third and Fourth Causes of Action asserted in the Removed Action are core proceedings under sections 157(b)(2)(A), (B), (H) and (O) of title 28 of the United States Code.

5. If any of the Second, Third and Fourth Causes of Action asserted in the Removed Action are found to be non-core, the Debtor consents to entry of final orders or judgment by the Bankruptcy Court as to each of the Second, Third and Fourth Causes of Action asserted in the Removed Action.

6. This notice is filed with the Clerk of the Bankruptcy Court as required by
Rules 9027(a) and 9001(3) of the Federal Rules of Bankruptcy Procedure.

Dated: New York, New York
December 28, 1998

SALOMON GREEN & OSTROW, P.C.
Proposed Attorneys for the Debtor and
Debtor in Possession

By: /s/ David M. Green
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